

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

GENERAL SECURITY NATIONAL  
INSURANCE COMPANY,

Plaintiff,

vs.

CAPITOL SPECIALTY INSURANCE  
CORPORATION and LYNCH  
INVESTMENT GROUP D/B/A  
ENVIRONMENTAL & TECHNICAL  
SERVICES LLC,

Defendants.

CIVIL ACTION NO.:  
1:22-cv-00692 (JHR) (AMD)

**NOTICE OF MOTION FOR  
PARTIAL SUMMARY  
JUDGMENT**

**PLEASE TAKE NOTICE** that on Monday, August 15, 2022, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for Plaintiff, General Specialty National Insurance Company (“General Security”), shall make application to the above Court at the Mitchell H. Cohen Building & U.S. Courthouse, 4<sup>th</sup> & Cooper Streets, Room 1050, Camden, New Jersey 08101, for an Order granting General Specialty’s Motion for Partial Summary Judgment in the above matter, and;

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, General Specialty shall rely upon the Memorandum of Law In Support of General Specialty’s Motion for Partial Summary Judgment, and;

**PLEASE TAKE FURTHER NOTICE** that, in further support of this motion, General Specialty shall also rely upon the Certification of Tara E. McCormack, Esq., and;

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 78.1(b), requests oral argument only if opposition to the motion is timely filed; and

**PLEASE TAKE FURTHER NOTICE** that General Specialty requests that the Court enter the proposed form of Order attached hereto.

**KENNEDYS CMK LLP**

Dated: July 19, 2022

By: /s/ Tara E. McCormack  
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Tara E. McCormack, Esq.  
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*Attorneys for Plaintiff*  
*General Security National Insurance*  
*Company*

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Notice of Motion for Partial Summary Judgment was served upon all counsel of record by electronic case filing (ECF) on July 19, 2022.

Dated: July 19, 2022

/s/ Tara E. McCormack  
Tara E. McCormack